

Title:

Mr

Forename:

Dirk

Surname:

Koopman

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

The type size in the reply boxes is too small. Unnecessarily so. I do not apologise for spelling mistakes as it is very difficult to read what I type.

Question 1:Do you agree with the proposal to include, as a matter of course, the 470 kHz and 5 MHz bands into the Licence for all Amateur Radio (Full) licensees?:

yes

Question 2:Do you agree that expressly linking a Full (Club) Licensee's authorisation to use the spectrum to his or her representation of a named club, and by adding a further ground for revoking the Licence to include

circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:

yes

Question 3:Do you agree that Ofcom should include a further ground of revocation in the Licence as proposed above in order better to align Clause 4 with the definition of 'Disqualified Person':

yes

Question 4:Do you agree that the word 'automatically' should be removed from Clause 4(5) of the Licence, in relation to the revocation of the Licence for failure to comply with the revalidation requirements?:

yes

Question 5:Do you agree that Clause 15 of the Licence should be updated to reflect the wording included in Ofcom's General Licence Conditions Booklet?:

yes

Question 6:Do you agree that Clause 13 of the Licence should be amended to allow for a simpler, more flexible approach for identifying Amateur Radio stations?:

yes

Question 7:Given the current uncertainty amongst Radio Amateur licensees in relation to Clause 2(2), do you believe that it would be a practical solution for Ofcom to remove this Clause and to insert additional wording into Clause 13, as proposed above?:

yes (and not before time)

Question 8:Do you agree with Ofcom's proposal to amend Clause 2(3) of the Licence to require Intermediate licensees to transmit a call sign that reflects the location of their main station?:

yes

Question 9:Do you agree that replacing Clauses 2(1) and 16(1) with a new Clause to simplify and bring together all of the licence conditions relating to the operation of radio equipment away from the Main Station address will make these provisions clearer?:

yes

Question 10: Do you agree that the proposed changes will clarify RAYNET operation under the Licence?:

Whilst I agree with nearly everything proposed, I am *deeply* unhappy with permitting any form of encryption.

Apart from "thin end of the wedge" arguments (the result of which might end up with encryption, everywhere, being allowed all the time). I am concerned that the use of RAYNET encryption, however operationally justified at the time, will prove *extremely* divisive within the Amateur Radio community.

I do have some experience here as I was intimately involved with the RAYNET/RAEN schism that happened in the early 1990s. This nearly caused the demise of RAYNET as a concept and certainly caused many once active RAYNET members to leave the service - including me.

Encryption, however carefully the rules are framed, will be the source of much controversy within the community. It will further alienate RAYNET operation on the bands. And trust me here: RAYNET operations (maybe that should read operators) are not universally welcomed.

Why is this? For example: there is a tendency for RAYNET operation(ers) to assume that they have some extra privileges (or rights) to operate in ways that, many say, override provisions in the licence. In particular the tendency for operators (or operations) to assume that they can "grab" a (range of) frequencies and then designate them as "RAYNET only" causes much offence. Particularly when that "grab" persists longer than operationally necessary - or "for ever".

I am also at a loss to understand how allowing encryption on the Amateur Service, which has eschewed it since inception, squares with government desires to be able to eavesdrop on all communications - at any time or in any place. Are you not, as an organisation, going to have to tie yourselves in knots defining what is permitted, key management, permitted ciphers etc etc.

Then consider the fact that RAYNET operators will need to practice and to test systems for dealing with encryption. Consider how this is going to impact on the wider community and then consider also the scope for abuse (both real and perceived).

I strongly believe in RAYNET (I may even rejoin now I have more time) but I equally strongly oppose the use of encryption in the Amateur Service for any reason. Clear communication is a strong defence against abuse. Obscuring the meaning of messages on, what will become, a routine basis will seriously compromise that defence. It should not be allowed. For any reason. <period>.